

## **Magdalene Grant**

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**From:** Rachel Dickon  
**Sent:** Monday, January 12, 2015 10:56 AM  
**To:** Magdalene Grant; tpayton@fmc.gov  
**Subject:** FW: 14-04: Status Report

**From:** Josh Parks [mailto:JParks@bvgklaw.com]  
**Sent:** Friday, January 09, 2015 5:08 PM  
**To:** Secretary Mailbox  
**Cc:** carlos@forsapr.com; Jeffrey, Eric; Nelson, Lindsey; Todd Kenyon; Judges Mailbox  
**Subject:** 14-04: Status Report

Dear Secretary,

Please accept this message as a partial status report in this matter. The Parties conferred by telephone conference on January 8 regarding the joint status report due today. The Parties continued to confer via email but have been unable at this time to reach an agreement regarding portions of the schedule going forward. The Parties have been able to agree as follows.

The First Joint Status Report in this matter was filed August 11, 2014. The Second Joint Status Report in this matter was filed October 10, 2014. The Third Joint Status Report in this matter was filed December 15, 2014.

With respect to discovery, the parties have conferred and the telephonic deposition of Edaf representative Carlos Matos is scheduled for 1000 a.m. on January 13, 2015. The telephonic deposition of Edaf's accountant Salvadore Lugo Cosme is scheduled for 1000 a.m. on January 14, 2015.

The Parties agree that an oral hearing is not necessary in this matter.

The Parties remain in ongoing discussions regarding the remainder of the joint status report, and will submit the report on Monday. Thank you for your consideration.

Respectfully Submitted,

Joshua S. Parks

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